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grounds alleged in excuse for the non-manufacture of the patented articles in England were the existence of litigation as to the validity of the patents, and the difficulty of successfully competing with rival makers of similar lamps and also with alleged infringers of the patent. Parker, J., held that the Act of 1907 was not intended to penalize patentees for want of success where they do their best to comply with its provisions, and that in this case they had sufficiently excused themselves.—*Canada Law Journal*.

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**Revocation of Patent—Non-manufacture of Patented Articles in United Kingdom.**—*In re Hatschek* (1909) 2 Ch. 68, was an application to revoke two patents of invention for non-manufacture of patented article within the United Kingdom, under the Patent Act, 7 Edw. VII, c. 29, ss. 24, 27 (see R.S.C. c. 69, s. 38). The patent was granted in respect of a process for manufacturing imitation stone slabs. The invention was in commercial operation in Germany, France and Belgium, but was never worked in the United Kingdom. The patentee devoted himself to the establishment abroad of industries in which the patented process was carried on, and had granted to a Belgium company an exclusive license for the United Kingdom of selling patented articles manufactured by the company in Belgium. Parker, J., held that the Act had not been complied with and the patents must be forthwith revoked, although in July, 1908, the Belgium company had published advertisements expressing their willingness to sell rights to manufacture the goods in England.—*Canada Law Journal*.